

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	CASE NO. 1:18CR708
	)	
Plaintiff,	)	JUDGE: CHRISTOPHER BOYKO
	)	
vs.	)	
	)	
KENNETH TYSON,	)	<b><u>DEFENDANT'S MOTION TO FILE</u></b>
	)	<b><u>MOTION UNDER SEAL</u></b>
Defendants.	)	

Defendant Kenneth Tyson, through counsel, hereby moves the Court for an order allowing him to file a motion for grand jury transcripts under seal. Defendant respectfully requests that he be permitted to file the motion under seal for two reasons: first, in an abundance of caution, given the government's track record of objecting to motions not being filed under seal; and second, the motion will have as attachments various exhibits that remain under seal. Counsel will serve the government with a copy of its motion upon filing.

Respectfully submitted,

/s/ Chris N. Georgalis  
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Edward Fadel (OH:0085351)  
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*Attorney for Defendant Kenneth Tyson*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 23, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Chris Georgalis  
Chris Georgalis

*Attorney for Defendant Kenneth Tyson*